

MEETING SUMMARY

NACEPT Superfund Subcommittee

February 11-12, 2004

Hilton Crystal City

Arlington, VA



*Prepared by Meridian Institute
April 2004*

NACEPT Superfund Subcommittee

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Hilton Crystal City

2399 Jefferson Davis Highway

Arlington, VA

The Superfund Subcommittee of the National Advisory Council for Environmental Policy and Technology (NACEPT) held its ninth and final meeting February 11-12, 2004 in the Washington D.C. area. This document summarizes discussion topics and key decisions made during the meeting. The meeting was open to the public and audio recorded. Interested individuals and members of the press were present as observers. The Subcommittee's agenda designated several opportunities for public comment. A written transcript was prepared and is available through the Environmental Protection Agency's (EPA) Docket #SFUND-2002-0005. Angelo Carasea, the Designated Federal Officer (DFO), is the primary point of contact for all public and press inquiries.

Introductions and Welcome

Dr. Raymond Loehr, Chairman of the Subcommittee, opened the meeting and welcomed the Subcommittee members. Dr. Loehr reminded the group of the Subcommittee's charge and summarized its activity since the December 2003 meeting and the goals for the ninth and final meeting. The February 11-12, 2004 meeting is intended to accomplish the following objectives:

- *Provide an overview of the final phase of the process*
- *Discuss areas of convergence in the final draft of the report*
- *Discuss areas of disagreement that remain and options for recording the range of views*
- *Reach agreement on the final package of recommendations that will be presented in the Final Report.*

The Introductory Statement was available as a handout and is included in Attachment A.

John Ehrmann, the lead facilitator for the group from Meridian Institute reviewed the objectives of the meeting and the material circulated prior to the meeting and summarized the agenda for the meeting and the draft report. He explained that the meeting would be used to resolve some of the critical areas of disagreement remaining in the report and that following the meeting, the next iteration of the report will be modified based on comments received from Subcommittee members in the meeting and in writing. The Meridian/Ross team would work to clearly identify agreements while also clarifying the range of opinions as accurately as possible.

Welcome from the Assistant Administrator

Marianne Horinko, Assistant Administrator, Office of Solid Waste & Emergency

Response, thanked the group for their support on the Subcommittee and provided a description of some of the Agency's preliminary efforts to prepare for implementation of the recommendations coming from the Subcommittee.

Direction for the next revision of the Report

The group agreed that the next iteration of the report would be revised based on comments received from Subcommittee members in the meeting and in writing. All Subcommittee members' names would remain on the report. This will reflect the fact that everyone helped to shape the recommendations and range of views reflected in the report. Additional agreement and clarification of the range of opinions would be integrated into the report. The group discussed options for capturing the range of views. In the cases where agreement could not be reached, the topics in the report could be addressed in one of the following ways.

- Discuss the issue and describe a range of views in general terms (Some people vs. some people)
- Add footnotes to address individual opinions, qualifications or contingencies associated with an individual(s) support for the consensus recommendation and text [if acceptable to the individual(s)]. – recommendation would still be presented as consensus.
- Discuss the issue and describe views with individual attribution (voluntarily).
- Drop the recommendation.
- Additionally, members would be given the opportunity to file comments (on individual recommendations or the report as a whole) in conjunction with the final review. A three page limit will be established for comments.

Following the meeting, these options were narrowed and revised.

The group agreed to review a "preview draft" to enable everyone to see the recommendations, supporting text and discussion of issues as they are likely to appear in the final report. The purpose of this preview draft was to make sure there are no surprises with respect to the understanding of where the Subcommittee was in agreement, where consensus had not been reached, and how consensus and ranges of views would be described in the final report.

Editing and Revisions to the Final Report

Meridian/Ross will be responsible for redrafting and coordinating among the members to address the issues raised at the meeting. They will work with Subcommittee members to resolve concerns and/or document dissenting views in a footnote or by other appropriate means. A summary of the key decisions and the status of recommendations at the time of the meeting follows.

Introduction Sections

The group agreed to revise the introductory sections of the report to reflect the changes in the recommendations and to address the comments that have been received to date.

Recommendations 1 & 2: Factors to Consider When Deciding Which NPL-Eligible Sites to Propose for Listing and Roles of EPA HQ and Regional Offices in Listing Determinations.

Based on discussions at the meeting, these recommendations were moved to be next to one another in sequence and the supporting text has been combined. Revised draft text was circulated at the meeting. Comments on this text were due by Friday, February 20th. In addition, a number of issues / concerns remained which would be documented in the range of views.

Recommendation 3: Early Involvement of Stakeholders in EPA's Evaluation of Sites for Listing

Provided issues associated with recommendations 16 and 17 for mega sites can be successfully resolved, this recommendation was stable at the time of the meeting. Minor editorial changes and clarifications may be made to the supporting text, based on comments. In addition, based on comments at the meeting, the discussion of the expanded site inspection / remedial investigation (ESI/RI) will be re-elevated to perhaps be a stand-alone recommendation and placed in the Mega Sites section as recommendation 16. (The current recommendation 16 will be renumbered to 17.)

Recommendation 4: Hazard Ranking System

There was not consensus on this recommendation and a range of views will be presented in the revised text. At least one Subcommittee member supports a more extensive review of the HRS with a view towards developing a screening system in which decisions are based on consideration of current, actual exposures. In addition, some Subcommittee members expressed concern that the discussion of using site-specific data to improve HRS screening should be improved and others have expressed concern that the draft text already encourages too much consideration of site specific data. Similarly, some Subcommittee members expressed a range of concerns about the specific exposure pathways identified for evaluation in the first part of the recommendation

Recommendation 5: Annual Report on the Superfund Program

Minor editorial changes and clarifications may be made to the supporting text, based on comments. For example, supporting text will be clarified to indicate that the annual report should both identify the NPL-candidate sites not listed (if any) and describe EPA's criteria and justification for its listing decisions. Additional information about the unlisted sites should also be considered.

Recommendation 6: Increasing Information on Sites Considered by the Superfund Program but Not Listed

A few Subcommittee members expressed concern that EPA efforts to notify stakeholders not duplicate ongoing efforts to address sites that may be underway by state, local or tribal environmental programs.

Recommendation 7: Other Programs

One Subcommittee member expressed concern that the report should not so strongly recommend consideration of other programs and not refer to other programs being used to successfully clean up NPL-caliber sites.

Recommendation 8: Leveraging Resources

One Subcommittee member expressed concern that it is redundant with Recommendation 7 and should therefore be deleted.

Recommendation 9: Capacity Building for State and Tribal Programs

Minor editorial changes and clarifications may be made to the supporting text, based on comments.

Recommendation 10: Expanding the Availability of TAGs

A range of views will be presented in the revised text to explain that Subcommittee members have different legal interpretations of the statutory language on TAGs. A number of Subcommittee members believe that the statute provides EPA with the discretion to extend TAGs to any NPL-eligible site by regulation. Other Subcommittee members believe that extending TAGs to any NPL-eligible site would require a change to the statute and therefore do not support this recommendation.

Recommendation 11: Setting Priorities among Sites Listed on the NPL

The following changes were agreed to at the February meeting:

- Revise the draft recommendation language to add “primarily”, add a summary of the factors to be used in setting priorities, and delete “as described below”.
- In the supporting text:
 - Move source control into tier 1
 - Delete footnote on removals and make new footnote saying Subcommittee did not evaluate and is not taking position on removal program
 - Add “current or potential future” to the bullet on nature of likely exposure (III-41/12)
 - Delete language on site reuse (will be silent on redevelopment) (III-41/26-27)
 - Add additional references to transparency

Insert Funding Discussion

Some participants noted that they see a relationship among recommendations 12, 13, 14 and A - funding). The funding discussion/recommendation will be moved from Chapter 6 and inserted into this chapter of the report to help set the context for this interrelated set of recommendations.

Recommendation 12: More Money to Cleanups

Supporting text needs to be added to describe the range of views on the meaning of “on-the-ground cleanup”. Revised text was circulated during the meeting. Comments on this text were due Friday, February 20th.

Recommendation 13: Independent Audit

Minor edits and clarifying changes will be made to supporting text based on comments. These will include: discussion of the diversity of views on the meaning of “on-the-ground cleanup”, a more accurate description of the funds/spending to be addressed in the audit (the entire Superfund appropriation and all spending, including administrative and intramural), and reference that the audit recommended should go beyond the audit being undertaken by the EPA IG in response to the 2004 appropriations language.

Recommendation 14: Testing Contract Reforms

Minor edits and clarifying changes will be made to supporting text based on comments. This will include: fixing or deleting the reference to corporate guarantees and the references to the potential concerns with guaranteed fixed price remediation contracts.

Recommendation 15: Mega Sites: Management Focus

Minor edits and clarifying changes may be made to supporting text based on comments.

Mega Sites: Consider an Expanded Site Inspection / Remedial Investigation (ESI/RI)
[New Recommendation 16 – numbering will be adjusted throughout the report]

This concept will be re-elevated to a recommendation that EPA consider an ESI/RI for large, complex sites as one of the mega site management recommendations.

Recommendation 16: Mega Sites: Large Geographic Areas

There is close to consensus on recommending a set of factors EPA would consider when looking at large, geographic areas. Work will continue to reach consensus on these factors and on other language. This includes the need to clarify the focus of the reference to transaction costs (potentially eliminating references to PRP-transaction costs).

Text on Additional Views Regarding Mega Sites

The details of this text will be removed from the main body of the report and included in an appendix. The fact that a range of views exists among members will be referenced in the introduction to this section but details will not be included.

Recommendation 17: National Priority Measures

Minor edits and clarifying changes will be made to supporting text to integrate concerns raised in comments but the recommendation will remain substantively unchanged.

Recommendation 18: The Need to Report a Core Set of Data (Performance Profile)

The wording of the recommendation and explanatory language will be softened. Clarifying and editorial changes will be made. The reference to the performance profile will be clarified and de-emphasized. Additional explanation will be added to address concerns raised by members in written comments. The discussion will further elaborate

on the range of views that are already discussed in the text.

Recommendation 19: Coordination with Tribal Nations, State and Local Government and Communities

Clarifying changes will be made to address the concerns raised by several members in written comments. These changes will elaborate on the existing discussion of a range of views but the majority of the recommendation will reflect the consensus of the members.

Recommendation A: Funding

This topic will be moved to the end of the NPL section of the report to be integrated with the efficiencies recommendations (12, 13, and 14). The topic will be used to help set the context for a broader discussion of resources for managing the NPL. The direction of this recommendation is still being discussed among Subcommittee members interested in trying to identify areas of consensus. If agreement cannot be reached, the section will be drafted to reflect the range of views that exists among Subcommittee members and discussed in the meetings. If agreement can be reached regarding the need for funds, a note will be added to integrate the message that additional funds are not intended to let recalcitrant PRPs get off the hook or discourage enforcement first.

Prevention

The text of this topic will be revised to integrate the concerns raised in writing and at the meeting. A discussion of the range of views will be added to address the concerns raised regarding the relevance of prevention as a Superfund Program priority. The current Recommendation under consideration is “The Subcommittee recommends that the EPA initiate a process to use Superfund Program data to identify trends that could inform decision making at proposed and operating facilities, as well as renewed focus on pollution prevention in Environmental Impact Assessments and Statements.”

Recommendation B: Financial Assurances-

A range of views will be integrated to address concerns raised by Subcommittee members in writing and at the meeting. Clarifying text will be added to address concerns regarding the lack of thorough understanding of the issue among some Subcommittee members and the interest in studying financial assurance “options”.

Recommendations C and D: ATSDR/NIEHS

Minor edits and clarifying changes may be made to supporting text based on comments. The text will remain substantively unchanged.

Recommendation E: Guidance for declaring Public Health Emergencies

The text will be modified to integrate the range of views that exists on the Subcommittee. Clarification will be added to reflect the lack of understanding or discussion that has occurred on this issue.

Recommendation F: Institutional Controls

Clarifying text will be added to integrate engineering or land use controls to this

recommendation. A cross reference to the MPP section will also be added.

Recommendation F: Superfund Alternatives Strategy

Subcommittee members who have raised concerns are being consulted in an attempted to present this discussion as consensus. An explicit recommendation is being considered. Minor modifications are expected to be made to the text. An explicit recommendation may be added.

Recommendations G, H, I: Additional dialogue at the national level

While the Subcommittee members can all live with the text in the report, the concerns raised in comments will be included to clarify the range of views, particularly with respect to the FACA process as a format option and the concern associated with resources being drained from “on the ground cleanup.”

Schedule

The group agreed to an aggressive schedule in order to add an additional iteration of the report while sticking to the March 31st deadline. Revisions would be minimized as much as possible in order to help stay on schedule and to maintain consensus where it exists. The schedule below shows key milestones and was modified slightly from that which was tentatively projected at the meeting.

March 1: Circulate preview draft to the Subcommittee. An electronic, redline/strikeout copy will be circulated. A hardcopy will not be mailed unless requested.

March 10: Due date for comments from the Subcommittee on the preview draft. Members will be asked to focus their comments only on those sections they cannot live with. Additional instructions for review will be circulated.

March 12- March 22: Final revisions will be made to the report.

March 22: Final report will be circulated to Subcommittee in electronic form. No additional changes will be made.

March 31: Deadline for Subcommittee response to report, including additional comments from members.

Spring: Formal submission to NACEPT Council for review.

Public Comment

Members of the public were invited to comment on perspectives and concerns regarding Superfund and the work of the Subcommittee. Testimonies are included in the meeting transcript, available through the DFO. The following individuals commented:

- Larry Silverman, Attorney, City of New Bedford
- Pat Casano, General Electric

The meeting adjourned on Thursday, February 12th, 2004.

ATTACHMENTS

- A. Meeting Introductory Information
- B. List of Subcommittee Members and Staff in Attendance
- C. List of Observers

Attachment A – Meeting Introductory Information

Introductory Information NACEPT Superfund Subcommittee February 11-12, 2004 Meeting

The Superfund Subcommittee of the National Advisory Council for Environmental Policy and Technology (NACEPT) was established in June 2002 for the purpose of assisting EPA in identifying the future direction of the Superfund Program in the context of other federal and state waste and site cleanup programs. Specifically, the Subcommittee was asked to review the relevant documentation and, to the extent possible, provide answers to questions that relate to: a) the role of the NPL, b) mega sites, and c) measuring program performance. The Subcommittee has operated as, and is subject to, the requirements of a Federal Advisory Committee.

Membership on the committee represents a diversity of interests. Subcommittee members include senior-level decision-makers and experts from: academia, business and industry, community and environmental advocacy groups, state, local and tribal governments, environmental justice, and non-governmental and professional organizations. Dr. Raymond Loehr, Professor of Civil Engineering Emeritus at the University of Texas in Austin, is the chair of the Subcommittee.

The Subcommittee has been working to accomplish its charge through Subcommittee meetings and interim Work Group meetings over about a 21-month period. It is anticipated that a consensus report will result from the Subcommittee deliberations. However, where consensus cannot be reached, a written discussion of the views of Subcommittee members will be provided. Where appropriate, the Subcommittee has also responded to issues in the form of “consultation,” i.e., dialogue, rather than a formal written report.

Interactive discussion and questioning for the purpose of probing an issue and clarifying a point has been encouraged. As such, any material developed by a Subcommittee member(s), any presentations by a Subcommittee member(s), or comments made by Subcommittee members at this meeting should neither be interpreted to reflect the current Subcommittee position on the subject under discussion, nor the final statements as they may appear in the final report. Additionally, the comments of an individual Subcommittee member should not be interpreted as positions of the EPA. The Subcommittee will deliberate thoroughly before developing consensus findings, conclusions or recommendations. At this meeting, the material in the current draft of the report will undergo rigorous review by all Subcommittee members before the Subcommittee report is finalized and transmitted to EPA.

Subcommittee Meetings

To date, the Subcommittee has held eight meetings. Six were held in Washington D.C. (June 17-19, 2002; September 23-24, 2002, January 7-8, 2003, September 3-5, 2003, November 5-7, 2003 and December 9-11, 2003), one was held in Phoenix, AZ (March 12-14, 2003), and one was held in New Bedford, MA (June 17-19, 2003). Summaries of these meetings are available on EPA's website at (<http://www.epa.gov/oswer/SFsub.htm>).

Summary of Activity Since Last Meeting

Subcommittee efforts between the December 2003 and February 2004 meetings concentrated on revising the draft report with input from the members via written comments and work group discussions. Subcommittee members participated in work group calls to address:

- The NPL site prioritization,
- Mega site management recommendations and
- Funding and other cleanup programs.

Objectives of the February 11-12, 2004 Meeting

The February 2004 meeting in Washington D.C. will be the final meeting of the Subcommittee. It is intended to accomplish the following objectives:

- Provide an overview of the final phase of the process
- Discuss areas of convergence in the final draft of the report
- Discuss areas of disagreement that remain and options for recording the range of views
- Reach agreement on the final package of recommendations that will be presented in the Final Report.

This is an open session for public record. Interested individuals and members of the press have been invited to attend as observers. The Subcommittee will hear public comments during the designated times on the agenda. Angelo Carasea, the Designated Federal Officer, will be available to assist reporters and other interested individuals who would like additional information. His contact information is available on the Roster at the registration table.

Attachment B – List of Subcommittee Members and Staff in Attendance

Raymond Loehr - Chairman
University of Texas at Austin
Civil Engineering Department
19360 Magnolia Grove Square #405
Landsdowne, VA 20176
phone number: 703-858-1175
fax number: 512-471-8449
e-mail: r.loehr@mail.utexas.edu

William Adams
Kennecott Utah Copper Corporation
5295 South 300 West, Suite 300
Murray, UT 84107
phone number: 801-743-4628
fax number: 801-743-4670
e-mail: william.adams@riotinto.com

Sue Briggum
Waste Management
601 Pennsylvania Avenue NW
North Building, Suite 300
Washington, DC 20004
phone number: 202-639-1219
fax number: 202-628-0400
e-mail: sbriggum@wm.com

Doris Cellarius
Sierra Club
621 Park Avenue
Prescott, AZ 86303
phone number: 928-778-6724
fax number: 253-830-7675
e-mail: doris@cellarius.net

Grant Cope
Earthjustice
705 Second Avenue
Suite 203
Seattle, WA 98104
phone number: 206-343-7340 x25
fax number: 206-343-1526
e-mail: gcope@earthjustice.org

Richard Dewling
Dewling Associates, Inc.
1605 Vauxhall Road
Union, NJ 07083
phone number: 908-687-6636
fax number: 908-687-6755
e-mail: dewling@aol.com

Steve Elbert
Remediation Management Company
BP America, Inc.
Mail Code 2-S; Room 293F
28100 Torch Parkway
Warrenville, IL 60555
phone number: 630-836-7108
fax number: 630-434-6359
e-mail: elbertsa@bp.com

Jane Gardner
General Electric
Corporate Environmental Programs
3135 Easton Turnpike
Fairfield, CT 06431
phone number: 203-373-2932
fax number: 203-373-2683
e-mail: jane.gardner@corporate.ge.com

Glenn Hammer
Ashland, Inc.
Environmental Health and Safety
P.O. Box 2219
Columbus, OH 43216
phone number: 614-790-3052
fax number: 614-790-4649
e-mail: ghammer@ashland.com

Dolores Herrera
Environmental Justice
2302 William Street SE
Albuquerque, NM 87102
phone number: 505-246-0201
e-mail: avanzar@aol.com

Robert Hickmott
Smith-Free Group
1401 K Street NW
Suite 1200
Washington, DC 20005
phone number: 202-626-6146
e-mail: rhickmott@smithfree.com

Aimee Houghton
Center for Public Environmental
Oversight
1101 Connecticut Avenue NW
Suite 1000
Washington, DC 20036
phone number: 202-452-8039
fax number: 202-452-8095
e-mail: aimeeh@cpeo.org

Ken Jock
St. Regis Mohawk Tribe
Environment Division
412 State Route 37
Akwasasne, NY 13655
phone number: 518-358-5937
fax number: 518-358-3203
e-mail: earth-kjock@northnet.org

Frederick Kalisz
City of New Bedford
133 William Street
New Bedford, MA 02740
phone number: 508-979-1410
fax number: 508-991-6189
e-mail: fkalisz@www.ci.new-bedford.ma.us

Gary King
State of Illinois
Illinois Environmental Protection
Agency
1021 North Grand Avenue East
Springfield, IL 62794
phone number: 217-782-0245
fax number: 217-557-4231
e-mail: gary.king@epa.state.il.us

Ed Lorenz
Alma College
Departments of History and Political
Science
614 West Superior Street
Alma, MI 48801-1590
phone number: 989-463-7203
e-mail: lorenz@alma.edu

Mildred McClain
Harambee House, Inc.
720 Maupaus Avenue
Savannah, GA 31401
phone number: 912-233-0907
fax number: 912-233-5105
e-mail: cfej@bellsouth.net

Michael Mittelholzer
National Association of Home Builders
Regulatory Affairs
1201 15th Street NW
Washington, DC 20005
phone number: 202-266-8660
fax number: 202-266-8056
e-mail: mmittelholzer@nahb.com

Tom Newlon
Stoel Rives
600 University Street
Suite 3600
Seattle, WA 98101
phone number: 206-386-7677
fax number: 206-386-7500
e-mail: tanewlon@stoel.com

Lindene Patton
Zurich North America
Zurich U.S. Specialties
1027 Utterback Store Road
Great Falls, VA 22066
phone number: 703-406-2689
e-mail: lindene.patton@zurichna.com

Victoria Peters
State of Colorado
Attorney General's Office
1525 Sherman Street
Denver, CO 80215
phone number: 303-866-5068
fax number: 303-866-3558
e-mail: vicky.peters@state.co.us

Kate Probst
Resources for the Future
1616 P Street NW
Washington, DC 20036
phone number: 202-328-5061
e-mail: probst@rff.org

Ed Putnam
State of New Jersey
Department of Environmental Protection
P.O. Box 413
401 East State Street, 6th Floor
Trenton, NJ 08625-0028
phone number: 609-984-2990
fax number: 609-777-1914
e-mail: eputnam@dep.state.nj.us

Catherine Sharp
State of Oklahoma
Department of Environmental Quality
707 North Robinson
P.O. Box 1677
Oklahoma City, OK 73101-1677
phone number: 405-702-5151
fax number: 405-702-5101
e-mail: catherine.sharp@deq.state.ok.us

Alexandra Shultz
Mineral Policy Center
Legislative and Regulatory Affairs
1612 K Street NW
Washington, DC 20006
phone number: 202-887-1872 x212
e-mail: lshultz@mineralpolicy.org

Mel Skaggs
InDepth Environmental Associates
320 West Highland
Southlake, TX 76092
phone number: 817-421-6633
fax number: 817-421-6644
e-mail: mmsnsl@aol.com

Richard Stewart
New York University School of Law
40 Washington Square South
New York, NY 10012
phone number: 212-998-6170
fax number: 212-995-4590
e-mail: stewartr@juris.law.nyu.edu

Wilma Subra
Louisiana Environmental Action
Network
3814 Old Jeanrette Road
New Iberia, LA 70562
phone number: 337-367-2216
e-mail: subracom@aol.com

Michael Tilchin
CH2M Hill
555 11th Street, N.W.
Suite 525
Washington, DC 20004
phone number: 202-393-2426 x581
fax number: 202-783-8410
e-mail: mtilchin@ch2m.com

Jason White
Cherokee Nation
Office of Environmental Services
P.O. Box 948
115 West North Street
Tahlequah, OK 74464
phone number: 918-458-5498
e-mail: jwhite@cherokee.org

Designated Federal Officer

Angelo Carasea
U.S. Environmental Protection Agency
Office of Emergency and Remedial
Response
1200 Pennsylvania Avenue NW
MC 5204G
Washington, DC 20460
phone number: 703-603-8828
fax number: 703-603-9104
e-mail:
carasea.angelo@epamail.epa.gov

EPA Representatives

Barry Breen
U.S. Environmental Protection Agency
Office of Solid Waste and Emergency
Response
1200 Pennsylvania Avenue NW
MC 5101T
Washington, DC 20460
phone number: 202-566-0200
fax number: 202-566-0207
e-mail: breen.barry@epa.gov

Phyllis Harris
U.S. Environmental Protection Agency
Office of Enforcement and Compliance
Assurance
MC 2201A
1200 Pennsylvania Avenue NW
Washington, DC 20460
phone number: 202-564-2440
fax number: 202-501-3842
e-mail: harris.phyllis@epa.gov

Lawrence Starfield
U.S. Environmental Protection Agency
Region 6
Fountain Place, 12th Floor, Suite 1200
1445 Ross Avenue
Dallas, TX 75202-2733
phone number: 214-665-2100
fax number: 214-665-6648
e-mail: starfield.lawrence@epa.gov

Facilitation Staff

Meridian Institute – Dillon, CO

John Ehrmann
Meridian Institute
P.O. Box 1829
Dillon, CO 80435
phone number: 970-513-8340 x203
fax number: 970-513-8348
e-mail: jehrmann@merid.org

Molly Mayo
Meridian Institute
P.O. Box 1829
Dillon, CO 80435
phone number: 970-513-8340 x310
fax number: 970-513-8348
e-mail: mmayo@merid.org

Ross & Associates Environmental
Consulting, Ltd.

Elizabeth McManus
Ross & Associates Environmental
Consulting, Ltd.
Seattle Tower Suite 1207
1218 Third Avenue
Seattle, WA 98101
phone number: 206-447-1805
fax number: 206-447-0956
e-mail: elizabeth.mcmanus@ross-
assoc.com

Attachment C - List of Observers and Public Comments

NACEPT Superfund Subcommittee February 11 & 12, 2003, Arlington, VA

Public Comment:

- Pat Casano – General Electric
- Larry Silverman- Attorney, City of New Bedford

Public Observers:

- Brenda Anderson – Ashland Inc.
- Pat Casano – General Electric
- William Chantry – DynCorp
- Paul Conner – EPA
- Carolyn Copper – U.S. EPA
- Joan Fisk – U.S. EPA
- Bill Frymoyer – National Environmental Trust
- John Hayworth - ISRI
- Steve Jones – ATSDR
- Mark Joyce – U.S. EPA
- Stephen Langel – IWP News
- Jean Martin – BP America
- Tim O’Leary - EPA
- Meredith Preston – BNA
- Christine Reinier – National Ground Water Association
- Corie Shomper -BPI
- Larry Silverman- Attorney, City of New Bedford
- Velma Smith – National Environmental Trust
- Rosemary Wisniewski – CSC/DynCorp
- Joel Wolf – EPA
- Malcolm Woolf – Senate Environmental Committee